

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 16-22484-CIV-ALTONAGA/O'SULLIVAN

ALAN L. FRANK LAW ASSOCIATES,

P.C.,

Plaintiff,

v.

OOO RM INVEST, *et al.*,

Defendants.

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MAJORITY OWNERS' FRCP 26(a)(3) DISCLOSURES

RIMON LAW, P.A.
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*Attorneys for Defendants
Sasha Schmdt, Sergey
Pirozhnikov, and potentially
OOO RM Invest*

Defendants Sasha Schmdt and Sergey Pirozhnikov (collectively, the “Majority Owners”) make the following disclosures pursuant to FRCP 26(a)(3):

FRCP 26(a)(3)(A)(i)

The Majority Owners expect to present the following witnesses at trial:

Alexander Degtev

Alan Frank

Zahar Katcaev

Eugene Khavinson

Sergey Pirozhnikov

Sasha Schmdt

There are no additional witnesses that the Majority Owners currently believe they may call if the need arises.

FRCP 26(a)(3)(A)(ii)

The Majority Owners expect to present deposition testimony from the July 23, 2015 and July 24, 2015 depositions of Mr. Katcaev (the latter of which having been taken in his representative capacity).

FRCP 26(a)(3)(A)(iii)

The Majority Owners expect to offer the following documents or other exhibits at trial:

Exhibit
1. Putative meeting minutes dated April 8, 2016
2. June 23, 2014 Deposition Transcript of Mr. Katcaev
3. July 23, 2015 Deposition Transcript of Mr. Katcaev
4. July 13, 2012 OOO RM Invest – Net Element Agreement
5. July 13, 2012 Information Letter executed by Mr. Katcaev
6. August 19, 2015 Affidavit of Mr. Katcaev
7. September 29, 2015 Settlement Agreement
8. Settlement Distribution Sheet
9. July 25, 2016 Declaration of Richard Mooney (Doc. #87-1)
10. April 29, 2016 Order of K.M. Prudnichenko
11. April 28, 2016 Minutes of extraordinary general meeting
12. May 31, 2016 Translation of Extract from the Unified State Register of Legal Entities
13. February 8, 2016 Notifications of General Meeting (and translations)
14. All documents filed in this action
15. All documents exchanged in discovery
16. All documents filed in the underlying action
17. All documents identified on Plaintiff's Exhibit List
18. All documents identified on Katcaev/Varwood's Exhibit List

There are no additional documents or other exhibits that the Majority Owners currently believe they may offer if the need arises.

Dated: January 9, 2017

RIMON LAW, P.A.

/s/ Natasha B. Dorsey

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PIROZHNIKOV, and potentially OOO RM

INVEST

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **January 9, 2016**, a true and correct copy of the foregoing was filed via PACER, and a complete copy of that filing, including notice of proof of filing was served via email addressed to the below counsel of record.

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